

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA.,

Plaintiff

v.

KIM DOTCOM, et al.,

Defendants

The Honorable Liam O'Grady

Criminal Action No. 1:12-CR-3

**NOTICE OF HEARING ON MOTION OF SPECIALLY-APPEARING  
DEFENDANT MEGAUPLOAD LIMITED TO DISMISS  
INDICTMENT FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that on July 27, 2012, at 10 a.m., or as soon thereafter as counsel may be heard, Defendant Megaupload Limited will move the Court for an order dismissing the indictment in criminal case number 1:12-cr-3 for lack of personal jurisdiction.

Respectfully submitted,

/s/ Heather H. Martin

William A. Burck

Derek L. Shaffer

Heather H. Martin (VSB # 65694)

QUINN EMANUEL URQUHART &

SULLIVAN LLP

1299 Pennsylvania Avenue N.W., Suite 825

Washington, D.C. 20004

(202) 538-8000

(202) 538-8100 (fax)

[williamburck@quinnemanuel.com](mailto:williamburck@quinnemanuel.com)

[derekshaffer@quinnemanuel.com](mailto:derekshaffer@quinnemanuel.com)

[heathermartin@quinnemanuel.com](mailto:heathermartin@quinnemanuel.com)

Ira P. Rothken

ROTHKEN LAW FIRM

3 Hamilton Landing

Suite 280

Novato, CA 94949

(415) 924-4250

(415) 924-2905 (fax)

[ira@techfirm.net](mailto:ira@techfirm.net)

Carey R. Ramos  
Robert L. Raskopf  
Andrew H. Schapiro  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, N.Y. 10010  
(212) 849-7000  
(212) 849-7100  
[careyramos@quinnemanuel.com](mailto:careyramos@quinnemanuel.com)  
[robertraskopf@quinnemanuel.com](mailto:robertraskopf@quinnemanuel.com)  
[andrewschapiro@quinnemanuel.com](mailto:andrewschapiro@quinnemanuel.com)

*Counsel for Defendant Megaupload Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2012, the foregoing Notice NOTICE OF HEARING ON MOTION OF SPECIALLY-APPEARING DEFENDANT MEGAUPLOAD LIMITED TO DISMISS INDICTMENT FOR LACK OF PERSONAL JURISDICTION was filed and served electronically by the Court's CM/ECF system upon all registered users.

/s/ Heather H. Martin  
Heather H. Martin (VSB # 65694)  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
1299 Pennsylvania Avenue N.W., Suite 825  
Washington, D.C. 20004  
(202) 538-8000  
(202) 538-8100 (fax)  
heathermartin@quinnemanuel.com